



November 1, 2022

Honorable Judge Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

via ECF e-file
cc: Torres_NYSDChambers@nysd.uscourts.gov

Re: *Hamilton v. Hernandez et al*, Case No. 1:22-CV-06172-AT
Letter-Motion to Extend the Deadline for TenThousands Projects, LLC to Answer Plaintiff's First Amended Complaint.

Dear Judge Torres:

I represent Plaintiff Warren Hamilton Jr. in the above reference case that was filed on July 20, 2022. This letter is submitted jointly on behalf of Plaintiff and defendant TenThousands Projects, LLC.

An emergency has arisen as I must withdraw as counsel for Plaintiff, and therefore we request that the Court grant TenThousands Projects, LLC with an extension of time to respond to Plaintiff's First Amended Complaint.

Tomorrow, Wednesday, November 2, 2022, Defendant TenThousands Projects, LLC answer or its proposed 12(b)(2) motion to dismiss to Plaintiff's First Amended Complaint is due. On October 27, 2022, Defendant TenThousands Projects, LLC sent me a pre-motion letter, informing Plaintiff that Defendant TenThousands Projects intends to file a 12(b)(2) motion to dismiss for lack of personal jurisdiction. Thereafter, on the evening of October 27, 2022, conflicts began to arise, between me and my client (the Plaintiff), that have affected the attorney-client relationship. While I have been trying to work to resolve those conflicts over the last few days, the differences are irreconcilable and have forced me to file a motion to withdraw as counsel for Plaintiff. I have discussed my withdrawal with Plaintiff, and Plaintiff has agreed to my withdrawal. I have also discussed my proposed withdrawal with opposing counsel for Defendants TenThousands Projects, LLC and UMG Recordings, LLC, and they have agreed to allow for my withdrawal. As part of the proposed motion to withdrawal as counsel, I have asked this Court to stay all proceedings for 30 days to allow my client the opportunity to find and retain new counsel by December 1, 2022.

Accordingly, I now write to motion for an extension that would allow Defendant TenThousands Projects, LLC the right to file its answer or its proposed 12(b) motion to dismiss to

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Plaintiff's First Amended Complaint within 15 days after the proposed 30-day stay (i.e., 15 days after December 1, 2022).

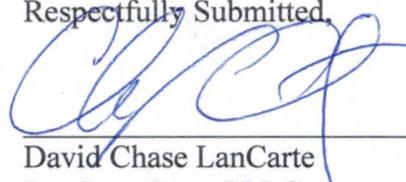
While I understand that pursuant to Section I.D. of your honor's Individual Practices in Civil Cases that extensions of time must ordinarily be made at least 48 hours prior to the scheduled deadline, I had been working to try and resolve the conflicts that recently arose affecting my ability to continue to represent Plaintiff in hopes that I would not have to file my motion to withdraw nor motion for the present extension. Unfortunately, the need for my withdraw was made apparent, late yesterday afternoon on October 31, 2022, within the 48-hour period to request an extension for Defendant Ten Thousand Projects, LLC to answer. Nevertheless, I respectfully request that the Court provide the requested extension, as this unforeseeable situation has created the present emergency.

This is the first request for an extension of time for Ten Thousand Projects, LLC to respond to Plaintiff's First Amended Complaint. (Defendant Ten Thousand Projects, LLC was previously granted an extension of time to respond to Plaintiff's original Complaint [see ECF Doc 22]).

This motion for an extension of time is unopposed and agreed to by Plaintiff and Defendant Ten Thousand Projects, LLC.

Accordingly, Plaintiff Warren Hamilton, Jr. and Defendants Ten Thousand Projects, LLC jointly motion for this Court to extend the deadline for Defendants Ten Thousand Projects, LLC to answer or file its 12(b)(2) motion to Plaintiff's First Amended Complaint until 15 days after the proposed 30-day stay period to allow Plaintiff the opportunity to find and retain new counsel.

Respectfully Submitted,



David Chase LanCarte
LanCarte Law, PLLC
2817 West End Ave., Suite 126-276
Nashville, Tennessee 37203
Tel: 214-935-2430
Fax: 214-935-2450
chase@lancartelaw.com

**ATTORNEY FOR PLAINTIFF
WARREN HAMILTON, JR.**

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CERTIFICATE OF SERVICE

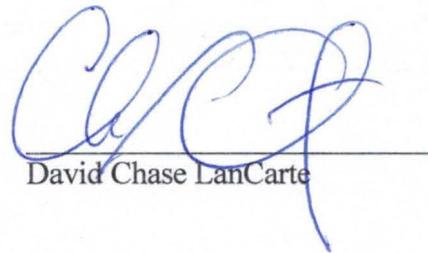
I do hereby certify that I have forwarded a true and correct copy of the above and foregoing pleading in this cause to all counsel of record on this 1st day of November, 2022 by electronic filing or U.S. mail or email.

Timothy Matson, Esq.
Philip Z. Langer, Esq.
Fox Rothschild, LLP
101 Park Avenue, Suite 170
New York, NY 10178
Tel: 612-607-7064
Fax: 612-607-7100
tmatson@foxrothschild.com
planger@foxrothschild.com

Attorneys for Defendant TenThousand Projects, LLC

Richard S. Mandel, Esq.
Cowan, Liebowitz & Latman, P.C.
114 West 47th Street
New York, New York 10036
Tel: 212-790-9200
Fax 212-575-0671
rsm@cll.com

Attorney for Defendant UMG Recordings, Inc.



David Chase LanCarte